



**AUG 01 2014**

Mr. Torrey Harding  
Diamond Foods  
P O Box 1727  
Stockton, CA 95201-1727

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-285  
Project # N-1142626**

Dear Mr. Harding:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-285-117-0 into the Title V operating permit. To install a diesel-fired emergency engine powering a firewater pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-285-117-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1142626

Engineer: Fred Cruz  
Date: July 22, 2104

Facility Number: N-285  
Facility Name: Diamond Foods  
Mailing Address: P O Box 1727  
Stockton, CA 95201-1727

Contact Name: Peter Aranda  
Phone: (209) 467-6255

Responsible Official: Torrye Harding  
Title: Director of Engineering

---

## **I. Proposal:**

Diamond Foods is proposing a Title V minor permit modification to incorporate the recently issued N-285-117-0 into the Title V operating permit. To incorporate ATC N-285-117-0 into the facility's Title V Operating Permit.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## **II. Facility Location:**

1050 South Diamond Street, Stockton, CA

## **III. Equipment Description:**

N-285-117-1: 86 BHP JOHN DEER MODEL 4045HF280G (OR EQUIVALENT)  
TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE  
POWERING A FIREWATER PUMP

#### **IV. Scope of EPA and Public Review:**

This change to a Title V permit is considered to be a minor modification, as such, requires no public review.

#### **V. Applicable Requirements:**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. Description of Proposed Modifications:**

Diamond Foods installed 86 bhp diesel-fired emergency engine powering a firewater pump.

The exceptions to the existing permit conditions will be listed below:

##### N-285-117-1

Permit condition 1 on the current Authority to Construct permit will be removed since the facility has submitted a Title V permit application to incorporate this ATC permit into their Title V operating permit.

#### **VII. Compliance:**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

**VIII. Attachments:**

- A. Proposed Modified Title V Operating Permit No. N-285-117-1
- B. Authority to Construct No. N-285-117-0
- C. Emissions Increases
- D. Application

# **ATTACHMENT A**

Proposed Modified Title V Operating Permit No.  
N-285-117-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-285-117-1

**EXPIRATION DATE:** 12/31/2015

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 86 BHP JOHN DEER MODEL 4045HF280G (OR EQUIVALENT) TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

## PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 3.1 g-NOx/bhp-hr, 0.6 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed 0.17 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rules 4102, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# **ATTACHMENT B**

Authority to Construct No.  
N-285-117-0



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-285-117-0

**ISSUANCE DATE:** 03/28/2014

**LEGAL OWNER OR OPERATOR:** DIAMOND FOODS INCORPORATED

**MAILING ADDRESS:**  
P O BOX 1727  
STOCKTON, CA 95201-1727

**LOCATION:**  
1050 S DIAMOND ST  
STOCKTON, CA 95205

**EQUIPMENT DESCRIPTION:**

86 BHP JOHN DEER MODEL 4045HF280G (OR EQUIVALENT) TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. Emissions from this IC engine shall not exceed any of the following limits: 3.1 g-NOx/bhp-hr, 0.6 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
7. Emissions from this IC engine shall not exceed 0.17 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
8. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
9. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

*Mark Kest for*

DAVID WARNER, Director of Permit Services

N-285-117-0 : Mar 28 2014 1:17PM - BRARG : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475



10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
12. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rules 4102, 4702 and 17 CCR 93115]
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

# **ATTACHMENT C**

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-285-117-0	12	1	2	0	1
<b>TOTAL</b>	<b>12</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>1</b>

# **ATTACHMENT D**

Application



# San Joaquin Valley Air Pollution Control District

www.valleyair.org

**RECEIVED**  
JUL 02 2014  
HEALTHY  
AIR  
LIVING

**Permits Services**  
SJVAPCD

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT    x ] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Diamond Foods	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>1050 S. Diamond Street</u>  CITY: <u>Stockton</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95358</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>1050 Diamond Street</u> CITY: <u>Stockton</u>  ____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Walnut process	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  ACT 117-0 to be a PTO	
6. TYPE OR PRINT NAME OF APPLICANT:  Torrey Harding	TITLE OF APPLICANT: Director of Engineering
7. SIGNATURE OF APPLICANT:  <i>Torrey Harding</i>	DATE: <u>6/23/14</u>  PHONE: ( 209 ) 467-6000 tharding@diamondfoods.co EMAIL: m

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED : \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>N-1142626</u> FACILITY ID: <u>N-285</u>

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: Diamond Foods	FACILITY ID: N - 285
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner: Torrey Harding	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official  
  
Torrey Harding

6.23.14  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Name of Responsible Official (please print)

\_\_\_\_\_  
Director of Engineering

\_\_\_\_\_  
Title of Responsible Official (please print)